

To: U.S. District Court, Western District of New York

Case#. 1:22-cv-00905-WMS-HKS

REQUEST FOR A 30-DAY EXTENSION OF TIME TO RESPONSE TO MOTION TO DISMISS

Dear Hon. H. Kenneth Schroeder Jr.:

I am writing to respectfully request an extension to respond to the motion to dismiss filed in this case. Due to unforeseen personal circumstances, including urgent family medical matters that require my immediate attention, I am unable to meet the original deadline.

Additionally, I would like to inform the court that I have recently left Advocates for Justice and am no longer employed by Arthur Swartz, in part to focus on personal matters. Consequently, the status of representation for the plaintiffs is currently in flux, which further complicates my ability to respond promptly to the motion.

I have discussed this matter with opposing counsel, David Lee, who understands the circumstances and has agreed to the proposed extension.

Given these reasons, I kindly request an additional 30 days. I believe that granting this extension will not prejudice the opposing party but will ensure that justice is served by allowing a thorough examination and response to the motion.

We appreciate the Court's consideration of this request and apologize for any inconvenience this delay may cause.

Thank you for your understanding.

Sincerely,

Nate McMurray

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